

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION
MAY 2023 SESSION

UNITED STATES OF AMERICA

v.

ISAAC JEROME GRAHAM

Criminal No. 4:23cr6

INDICTMENT

In Violation of:

18 U.S.C. § 1951(a)

18 U.S.C. § 924(c)

18 U.S.C. § 922(g)(1)

COUNT ONE

The Grand Jury charges that:

1. On or about December 28, 2022, in the Western District of Virginia, the defendant, ISAAC JEROME GRAHAM, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain United States currency from the possession and custody of an employee of the Sunrise store located at 2305 North Main Street, Danville, VA, against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property in his custody and possession, that is the defendant used, carried, displayed, possessed, brandished, and discharged a firearm at the store employee.

2. At all times material to this Indictment, Sunrise, located at 2305 North Main Street, Danville, Virginia, was engaged in the “fuel and convenience store” business, an industry which affects interstate and foreign commerce.

3. All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

The Grand Jury further charges that:

1. On or about December 28, 2022, in the Western District of Virginia, the defendant, ISAAC JEROME GRAHAM, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery in violation of Title 18, United States Code, Section 1951, as set forth in Count One of this Indictment.

2. All in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(i), 924(c)(1)(A)(ii), and 924(c)(1)(A)(iii).

COUNT THREE

The Grand Jury further charges that:

1. On or about December 28, 2022, in the Western District of Virginia, the defendant, ISAAC JEROME GRAHAM, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Glock Model 19 9mm pistol. Said firearm had previously been shipped and transported in interstate or foreign commerce.

2. All in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

1. Upon conviction of the felony offense alleged in this Indictment, the defendant shall forfeit to the United States:

- a. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).
2. The property to be forfeited to the United States includes but is not limited to the

following property:

a. **Firearm**

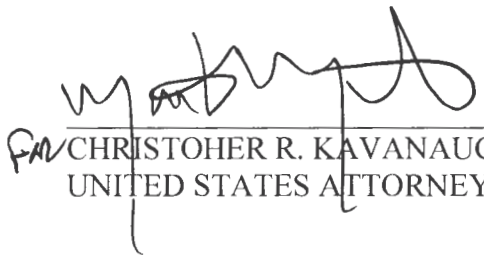
- 1) A Glock Model 19, 9mm pistol, serial #BRWZ252
- 2) All ammunition, magazines, and accessories associated with these firearms
3. If any of the above-described forfeitable property, as a result of any act or omission

of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL this 18th day of May, 2023.


CHRISTOHER R. KAVANAUGH
UNITED STATES ATTORNEY

/s/Grand Jury Foreperson
FOREPERSON